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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ELLIS FULTON KINGSEP, a/k/a “Ellis  
King,”

Defendant.

No. 4:24-cr-00006-RRB-SAO

COUNTS 1-5:

MAIL FRAUD

Vio. of 18 U.S.C. § 1341

COUNT 6:

AGGRAVATED IDENTITY THEFT

Vio. of 18 U.S.C. § 1028A

COUNT 7:

SOCIAL SECURITY FRAUD

Vio. of 42 U.S.C. § 408(a)(3)

CRIMINAL FORFEITURE

ALLEGATION:

18 U.S.C. § 981(a)(1)(C), 28 U.S.C. §  
2461(c), and Fed. R. Crim. P. 32.2(a)

**INDICTMENT**

The Grand Jury charges that:

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## INTRODUCTORY ALLEGATIONS

1. From a date unknown to the Grand Jury but in or about 1989 until no later than in or about 1995, Leitha Mary Aude, who was born in 1921, lived at 2965 Finch St., Los Angeles, California, and received retirement benefits from the Social Security Administration, the Government of Canada, and the Braille Institute of America. She would be 102 years of age as of the date of this Indictment.

2. On or about July 11, 1993, a Medicare claim was made for Leitha Mary Aude by a durable medical equipment provider in Glendale, California, but no other Medicare claims were ever made by her or on her behalf since that date.

3. On or about October 26, 1993, Leitha Mary Aude was issued a driver's license by the State of California Department of Motor Vehicles, expiring in 1997, which was never renewed.

4. On or about November 15, 1993, the Braille Institute received a handwritten letter signed "Leitha Aude" which purported to authorize her son, Defendant ELLIS FULTON KINGSEP, to sign checks on her behalf and requesting electronic funds transfer to an account at First Interstate Bank.

5. On or about April 20, 1995, the Braille Institute received a change of address card bearing a signature of "Leitha M. Aude" and changing her address from 2965 Finch St. to 1608 N. Cahuenga Blvd. # 209, Los Angeles. The new address was a private mailbox service.

6. In or about July 1995, mail sent to Aude at 2965 Finch St. was returned as undeliverable to the Social Security Administration.

7. On or about September 27, 1995, the residence at 2965 Finch St. was sold by probate/estate transfer, according to records of the Los Angeles County Assessor's Office.

8. On or about November 1, 1996, the Social Security Administration began direct deposits of social security retirement benefits for Leitha Aude to account -2340 at Wells Fargo Bank, N.A. Between 1989 and 1996, benefits were deposited to another Wells Fargo account, -7561. Account -2340 was held in the names of Leitha Aude and Defendant ELLIS FULTON KINGSEP. From that date until 2023, the Social Security Administration continued to make monthly payments to Leitha Aude to this account. Bank security videos show Defendant regularly withdrawing cash from the account at automated teller machines in Los Angeles.

9. In or about April 2009, the Braille Institute received a change of address notice dated April 20, 2009, and signed "Leitha Aude" changing her address from 1608 N. Cahuenga Blvd. #209 to 78670 Highway 111, #108, La Quinta, CA. The new address was a private mailbox service.

10. In or about April 2009, the Social Security Administration received a change of address notice dated April 20, 2009, and signed "Leitha Aude" changing her address from 1608 N. Cahuenga Blvd. #209 to 78670 Highway 111 #108, La Quinta, CA, and adding: "There is no change in direct deposit information." The new address was a private mailbox service.

11. On or about March 9, 2012, the Braille Institute received a change of address notification dated March 5, 2012, and signed "Leitha Aude" changing her address of record

from 78670 Highway 111 #108, La Quinta, CA to 78365 Highway 111 #178, a private mailbox service.

12. On or about April 11, 2013, Defendant ELLIS FULTON KINGSEP established an account with The Fairbanks Connection in Fairbanks, Alaska. The application established the service in the name of “Leitha Aude” and “Ellis Kingsep”, and requested all letters be forwarded to “E. King” at 1027 Davie St. # 339, Vancouver, BC, Canada. The Canadian address is that of “Mail Box Plus,” another private mail service business. Defendant made periodic annual payments of \$150 by Postal Money Order, often paying two years in advance. The account application listed email addresses associated with Defendant.

13. Beginning in or about September 2013, Wells Fargo Bank began mailing monthly statements for checking account -2340 to Leitha Aude and Ellis Kingsep, 684 Gradelle Ave, Fairbanks, AK. Previously, statements had been mailed to 78365 Highway 111 #178, La Quinta, CA.

14. On or about October 21, 2013, the Social Security Administration received a change of address notice dated October 16, 2013, and signed “Leitha Aude” stating that “In order to be closer to family members I am moving to Alaska.” The letter requested the address be changed from 78670 Highway 111 # 108, La Quinta, to 684 Gradelle Ave., Fairbanks, AK, the address of the Fairbanks Connection mail forwarding service, and adding a phone number with an Alaska area code: (907) 331-4450.

The telephone number (907) 331-4450 was a Voice Over Internet Protocol (VOIP) number serviced by United World Telecom, which offered virtual phone numbers with any

area code to clients. The account email address is one used by Defendant ELLIS FULTON KINGSEP.

15. On or about November 25, 2013, Defendant ELLIS FULTON KINGSEP completed an Application for Delivery of Mail Through Agent, PS Form 1583, with La Quinta Mailbox Pack and Ship, 78365 Hwy. 111, La Quinta, CA, for mailbox number 178. The application was signed by “Ellis Kingsep” and listed a home address of 1027 Davie St. # 339, Vancouver, BC, Canada. This is the address of “Mail Box Plus,” another private mail service business.

16. Beginning at a date unknown to the Grand Jury but at least in 2014 and continuing until on or about the date of this Indictment, Defendant ELLIS FULTON KINGSEP did establish and maintain an account with Robson Print and Ship, 1771 Robson St. Box 377, Vancouver, BC, Canada. Leitha Aude’s name was not associated with the mailbox. Robson Print and Ship received mail from the La Quinta and Fairbanks addresses, which was repackaged and forwarded to Defendant at “Studio Repair, 1439 N. Highland Ave. # 253, Los Angeles.” Defendant paid for the mail service via Western Union money transfers.

17. On or about April 25, 2015, Defendant ELLIS FULTON KINGSEP completed an Application for Delivery of Mail Through Agent, PS Form 1583, with Highland Postal Center, requesting mail delivery through them at 6775 Santa Monica Blvd. #4-253, Los Angeles. The form was under the name of “Studio Repair” and “E. King”, and signed, “E. King.” The listed home address was 78365 Highway 111 # 178, La Quinta,

CA, the mailbox service. Defendant presented a California driver license as identification. Leitha Aude's name appears nowhere on the documents.

18. Beginning in or about April 2017, Wells Fargo Bank began mailing monthly statements for checking account -2340 to Leitha Aude and Ellis Kingsep, 1587 Drouin Rd., Fairbanks, AK. Previously, since 2013, statements had been mailed to 684 Gradelle Ave., Fairbanks, AK.

19. On or about March 30, 2018, the Social Security Administration received a letter dated March 22, 2018, signed "Leitha Aude", and changing her address from 684 Gradelle Ave., Fairbanks, to 1587 Drouin Rd., Fairbanks, and a new mailing address of PO Box 73918, Fairbanks. All of these addresses were associated with the Fairbanks Connection mail forwarding service.

20. In or about April 2022, Defendant ELLIS FULTON KINGSEP sent a letter to The Fairbanks Connection mail service and a Money Order to pay for his mailbox. The letter inquired about how to use Alaska addresses to register motor vehicles and discussing the difficulty of opening a bank account without "a real address."

21. On or about November 21, 2022, a letter signed "Leitha Aude" was sent to the Social Security Administration, referencing social security number xxx-xx-6703, and changing the address from 1587 Drouin Rd., Fairbanks, to PO Box 73918, Fairbanks.

22. In or about May 2023, Defendant ELLIS FULTON KINGSEP sent a Postal Money Order via the U.S. Postal Service in the amount of \$150 to The Fairbanks Connection for "2024 box rental." The remitter was "E. King" with an address of 78365 Hwy 111 #175, La Quinta, CA.

23. On or about May 5, 2023, the Social Security Administration, Rm 38, 101 12<sup>th</sup> Avenue, Fairbanks, AK, sent a letter to Leitha Aude at 1587 Drouin Dr., PO Box 73918, Fairbanks, AK. The letter requested that Aude call their office before May 20, 2023.

24. On or about June 14, 2023, a change of mailing address notice was sent to the Social Security Administration signed “Leitha Aude” changing her address from 1587 Drouin Road, PO Box 37918, Fairbanks, AK to 78365 Highway 111 #178, La Quinta, CA. The letter stated that Aude was moving from Fairbanks to the Palm Springs area due to health concerns. On that date, she would have been one week shy of her 101st birthday.

25. In or about August 2023, the Social Security Administration suspended benefit payments to Leitha Aude. Between September 1995 and August 2023, the Social Security administration paid approximately \$423,215 in social security retirement benefits to Leitha Aude, directly deposited to Wells Fargo Bank accounts.

#### THE SCHEME TO DEFRAUD

26. Beginning at an exact date unknown to the Grand Jury, but approximately in or about 1995, and continuing until at least on or about June 14, 2023, within the District of Alaska, the Central District of California, and elsewhere, the defendant, ELLIS FULTON KINGSEP, devised a scheme to defraud the Social Security Administration by obtaining benefits in the name of his mother, Leitha Aude.

27. Defendant ELLIS FULTON KINGSEP created private postal mailbox accounts in order to deceive the Social Security Administration, and other payors, by

distancing himself from Leitha Aude's correspondence and disguising the fact that he was sending and receiving mail in her name.

28. Defendant ELLIS FULTON KINGSEP, through the manner and means described above, did between 2013 and 2023, cause mail from the Social Security Administration, Wells Fargo Bank, and others to be delivered to addresses in Fairbanks, Alaska, which were in truth and in fact as Defendant then and there well knew, addresses connected with The Fairbanks Connection, a mail service and not his mother's, or his own, actual residence address.

29. The Fairbanks Connection, pursuant to instructions from Defendant, repackaged the mail and forwarded it in the Defendant's name to Mail Box Plus and/or Robson Print and Ship, private mailbox services located in Vancouver, British Columbia. Those services, again pursuant to instructions from Defendant, repackaged and forwarded the mail to Defendant at private mailbox services, including but not limited to the Highland Postal Center in Los Angeles, where Defendant regularly collected the mail.

30. The Social Security Administration, the Government of Canada, and the Braille Institute of America made regular, monthly deposits to the Wells Fargo Bank account held in the names of Defendant ELLIS FULTON KINGSEP and Leitha Aude. Defendant regularly withdrew cash from the account by using automated teller machines.

#### COUNTS 1-5

31. Paragraphs 1 through 30 of this Indictment are hereby incorporated by reference as if fully restated herein.



32. On or about the dates listed below, within the District of Alaska, the Central District of California, and elsewhere, the defendant, ELLIS FULTON KINGSEP, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, and concealment of material facts, did cause to be delivered certain mail matter by the United States Postal Service and by private or commercial interstate carrier, for the purpose of executing such scheme and artifice, with each mailing constituting a separate and distinct offense:

COUNT	DATES SENT	DESCRIPTION OF MAILING
1	April 2022	Letter to The Fairbanks Connection in Fairbanks, Alaska including \$150 Money Order payment for mailbox
2	April 2022	Wells Fargo checking statement -2340 mailed to defendant by The Fairbanks Connection in Fairbanks, Alaska to Robson Print and Ship in Vancouver, British Columbia
3	May 2023	\$150 Postal Money Order payment for mailbox to The Fairbanks Connection in Fairbanks, Alaska
4	May 2023	Social Security Administration letter mailed to defendant by The Fairbanks Connection in Fairbanks, Alaska to Robson Print and Ship in Vancouver, British Columbia
5	June 14, 2023	Letter to Social Security Administration in Fairbanks changing address from Fairbanks, AK to La Quinta, CA

All of which is in violation of 18 U.S.C. § 1341.

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### COUNT 6

33. On or about June 14, 2023, within the District of Alaska and elsewhere, Defendant ELLIS FULTON KINGSEP, knowingly possessed and used, without lawful authority, a means of identification that Defendant knew belonged to another person, to wit: the name, social security number, and signature of Lethia Aude on a letter to the Social Security Administration, during and in relation to the offense of Mail Fraud, a felony violation of 18 U.S.C. § 1341, as charged in Count Five of this Indictment.

All of which is in violation of 18 U.S.C. § 1028A.

### COUNT 7

34. On or about June 14, 2023, within the District of Alaska and elsewhere, Defendant ELLIS FULTON KINGSEP, did knowingly make and cause to be made a false statement and representation of a material fact for use in determining rights to payment of social security benefits, by mailing a letter to the Social Security Administration, Rm 38, 101 12<sup>th</sup> Ave., Fairbanks, AK referencing Leitha Aude, her social security number, and changing her address from Fairbanks, Alaska, to La Quinta, California.

All of which is in violation of 42 U.S.C. § 408(a)(3).

### CRIMINAL FORFEITURE ALLEGATION

35. The allegations contained in Counts 1-6 of this Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C § 981(a)(1)(C) with 28 U.S.C. § 2461(c).

36. Upon conviction of any of the felony offenses charged in Counts 1-6 of this Indictment, Defendant ELLIS FULTON KINGSEP shall forfeit to the United States of

America, any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. §§ 1341 and 1028A.

37. If any property subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C), as a result of any act or omission of the defendant

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant, including but not limited to an in personam criminal forfeiture money judgment.

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All pursuant to 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c), and 21 U.S.C. § 853(p).

A TRUE BILL.

s/ Grand Jury Foreperson  
GRAND JURY FOREPERSON

s/ Thomas C. Bradley  
THOMAS C. BRADLEY  
Assistant U.S. Attorney  
United States of America

s/ S. Lane Tucker  
S. LANE TUCKER  
United States Attorney  
United States of America

DATE: May 21, 2024